



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date 10/6/99
Time Start _____
Time Finish _____

HAZARDOUS WASTE INSPECTION REPORT

☐ GENERATOR ☒ S Q GENERATOR

Company name Bulova Technologies LLC. I.D. Number PAD000800680
Site Address 101 N. Queen St.
County Leicester Municipality Lancaster City Zip 17604-4787
Name of Inspector John A. Pollock
Name & Title of Responsible Official Robin E. Thomas
Person Interviewed Robin E. Thomas Telephone (717) 299-2581
Mailing Address (if different from above) _____
Amount of Hazardous Waste Generated per Month: _____ Pounds _____ Kgs

1. Site Characterization:

STORAGE: ☒ Container ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad Other _____

PBR: ☒ Neutralization/WWTP ☐ Reclaim Other _____

GENERATOR TREATMENT ☐ Containers ☒ Tanks ☐ Containment Bldg. ☐ Drip Pad

2. Universal Waste: ☒ Large Quantity Handler ☐ Small Quantity Handler

Universal Waste Types _____

3. Hazardous Waste Transporters:

Transporter Name Clean Harbors License Number MD0672222250

Transporter Name Bulova Technologies License Number PA-AH 0457

Transporter Name Republic Env. Systems License Number PAD085620592

4. Types of hazardous waste generated and destination facility (location & type).

Waste Code	Waste Description	Destination Facility
F003	Methyl Ethyl Ketone	Clean Harbors
F006	Filter cake	Spring Grove Resource R. ^{Willow St., PA}
D003	Waste Detonators	Bulova Tech. (Bunker)
F003	Dichloromethane	Republic Env. Services
D001	Flammable liquids, aerosols	Republic

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HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name Bufoin Tech ID Number PA0005F00680 Date 12/6/99
 1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
				CONTAINERS (Subchapter I)			
X				Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
X				Containers of hazardous waste in good condition	265a.1	265.171	H026
X				Containers and stored waste compatible	265a.1	265.172	H027
X				Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
X				Containers managed to prevent leaks	265a.1	265.173(b)	H029
X				Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
X				Container storage areas inspected at least weekly	265a.1	265.174	H031
X				Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
X				Proper containment and collection systems in place	265a.179		H033
	X			Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
X				Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
X				Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
X				Containers labeled accurately identify contents	SWMA 6018.403(b) (2)		H037



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**Hazardous Waste Inspection Report
Hazardous Waste Permit by Rule Facility**

Company name Bulova Technologies
I.D. Number PAD 000800680

Determination of Applicability Required? 270a.60 Yes ☒ No ☐ N.D. ☐
Documentation Available? Yes ☒ No ☐ N.D. ☐
Does facility accept wastes from off-site for treatment in the PBR system? Yes ☐ No ☒ N.D. ☐
Does facility have an NPDES permit? Yes ☐ No ☒ N.D. ☐
If yes, NPDES Permit Number _____
If no, does facility discharge to a sewage treatment system with an NPDES permit? If yes, NPDES Permit Number _____ Yes ☒ No ☐ N.D. ☐
If yes, does system meet all Federal, State and local pretreatment standards? Yes ☐ No ☐ N.D. ☒

If system does not directly discharge to a POTW or its own NPDES permitted discharge, explain here.

Site Name _____ ID Number _____ Date 12/6/99

**Hazardous Waste Inspection Report
Hazardous Waste Permit by Rule Facility (WWTP)**

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NUMBER
X				Facility has applied for or received an EPA Hazardous Waste Identification Number	264a.1	264.11	H550
X				Active portion has 24 hour surveillance	264a.1	264.14(b)(1)	H551
X				Artificial barrier surrounds active portion	264a.1	264.14(b)(2)	H552
X				Proper signs are posted	264a.1	264.14(c)	H553
X				Inspections are conducted as per inspection plan	264a.1	264.14(b)(1)	H554
X				Inspection schedule is retained at facility	264a.1	264.15(b)(2)	H555
X				Deterioration and/or malfunctions of equipment corrected as revealed by inspections	264a.1	264.15 (c)	H556
X				Immediate remedial action taken when a hazard is imminent or already present	264a.1	264.15(c)	H557
X				Inspection log is maintained and utilized properly	264a.1	264.15 (d)	H558
X				Personnel training plan approved by DEP and implemented	264a.1	264.16 (a)	H559

Generator I.D. # PA000800680 Telephone # (717) 298-2561
 Site Name Bulova Technologies Operator Name Same
 Site Address 101 North Queen Street Address Same
Lancaster, PA 17604
 Municipality Lancaster City County Lancaster
 Responsible Official Robin E. Thomas Title Director of Env.
 Person Interviewed Robin E. Thomas Title and Chemical Serv.
 Inspector John A Pollock Time and Regulatory Comp.

101

Amount Generated: 19,100 lb./mo.

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Generator Name Bulova Tech

Date 12/06/99

INSPECTION REPORT - RESIDUAL WASTE GENERATOR

1 = No Violation Observed

2 = Not Applicable

3 = Not Determined

4 = Non-Compliance

Chapter Citation	Requirement	Status				Line Number
		1	2	3	4	
25 Pa Code	GENERAL PROVISIONS					
287.6	Designated facility: valid permit? Permit Number (PA) _____	X				3001
287.52(a)	Biennial report submitted by March 1 of each odd numbered year.	X				3002
287.53	Written source reduction strategy on file and in effect.	X				3003
287.53(b)	Waste reduction strategy covers all waste streams.	X				3004
287.53(c)	Reduction strategy updated every five years or when waste or manufacturing process changes.			X		3005
287.54	Waste analysis performed: copy on file.	X				3006
287.54(b, f)	Annual analysis or certification of waste submitted to Department and designated facility.	X				3007
287.55	Small quantity generator record keeping requirements.		X			3008
287.101(a)	Operation of disposal or processing facility without a permit.	X				3009
	STORAGE REQUIREMENTS					
299.111(1)	Residual waste not mixed with hazardous waste.	X				3010
299.111(2)	Waste stored as not to create a safety risk.	X				3011
299.111(3)	Residual waste not mixed with special handling waste.	X				3012
299.111(4)	Waste not blown or otherwise deposited outside storage area.	X				3013
299.112(c)	Storage area inspected; records available.	X				3014
299.113(a)	All waste stored less than one year.	X				3015
299.114(a)	Equipment maintained in operable condition.	X				3016
299.114(c)	Equipment cleaning frequencies maintained.	X				3017
299.115	Vectors controlled and public nuisances prevented.	X				3018
299.116(a)(b)	Run on, runoff minimized; storage areas managed in accordance with Clean Streams Law.	X				3019
299.116(c)	Waste stored to prevent groundwater degradation.	X				3020
299.121	Sufficient number of properly constructed storage containers.	X				3021
299.122	Storage tank design standards.	X				3022
299.112(d), 299.131(b)	No putrescible waste or liquid waste stored in piles.	X				3023
299.131	Waste storage pile area properly designed, constructed and maintained.	X				3024
299.132	Storage pad or liner system properly designed and maintained.	X				3025
299.133	Proper design and maintenance of leachate and runoff control systems.	X				3026
299.151	Proper storage and containment of incinerator ash residue.		X			3027
299.152	Proper storage and containment of friable asbestos containing waste.		X			3028
299.153	Proper storage and containment of coal ash.		X			3029
299.154	Proper storage and containment of PCB containing waste material.		X			3030

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INSPECTION REPORT COMMENTS

Date of inspection 12/06/99Identification Number PAD00800680Company/Facility/Site Name Bulova Technologies L.L.C

On the date above, the Department conducted a routine Hazardous and Residual Waste inspection of Bulova Technologies L.L.C. in Lancaster City, Lancaster County. Present were: Mike Maiolie and John Pollock from DEP, Robin E. Thomas of Bulova Tech.

Background:

Bulova is mainly involved in the assembly of military detonators for use in military ordinances and the assembly of various commercial equipment used in a variety of industries. It employs approximately 250 and primarily operates one daylight shift.

The company previously operated a facility on Stoney Battery Road, West Hempfield Township, Lancaster County. This location is currently being used by another company.

Observations:

The facility is currently attempting to determine the Hazardous Waste Generator Universe, amount generated, at the facility to correctly determine it's Hazardous Waste requirements. The company is currently assuming it is a large quantity generator until this evaluation is complete. This evaluation is necessary due to a concerted effort by the company to reduce its waste streams it produces. **(Bulova has since finished its Universe evaluation and determined it is a Small Quantity Generator)**

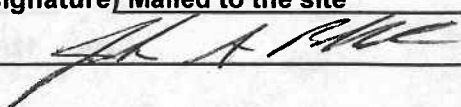
Hazardous Waste is stored inside the building and with secondary containment. The waste was properly labeled and had accumulation dates as required. Seven lab packs of various sizes were noticed, packing list attached, were stored in this area awaiting shipment.

The company also holds a Hazardous Waste Transporter license and according to Robin E. Thomas it is used for transportation of waste to its other facility, referred to as the "Bunker", on Millwood Road, Willow Street, PA.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) Mailed to the siteDate 12/07/99Inspector (signature) Date 12/12/99